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March 10, 2023

**Via ECF:**

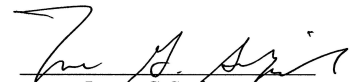
The Honorable Lorna G. Schofield, U.S.D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Application **granted in part**. The parties have offered no compelling reason for the requested extension. The deadline for the parties to file their joint requests to charge, voir dire, verdict form and any memorandum of law is extended to **March 17, 2023**, and the deadline to file the final pretrial order is extended to **March 24, 2023**. The case shall remain in fourth place on the Court's trial calendar to commence on April 17, 2023.

Dated: March 13, 2023

New York, New York

Re: **Rossete et al v. Hong Kong Kitchen (USA) Inc.**  
Civil Docket No.: 22-cv-03049 (LGS)

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

We represent the Plaintiffs in this FLSA action, and we respectfully submit this joint letter motion together with Defendants' counsel to respectfully request an extension of time for the parties to submit their joint requests to charge, voir dire, verdict form, and pretrial memorandum of law, as provided in Your Honor's Individual Rules, as well as the parties' joint final pretrial order.

On January 19, 2023, the court directed, *inter alia*, that the above referenced documents shall be filed by March 10, 2023, with the exception of the parties' joint final pretrial order, which shall be filed by March 17, 2023. *See* Dkt. No. 25. Lastly, the Court scheduled this matter to be ready for trial by April 17, 2023, with a jury trial currently set for April 17, 2023, at 9:45 a.m. *Id.*

The reason this request is made, is that the parties will require some additional time to prepare the above referenced documents, and the parties reasonably anticipate three additional weeks to be sufficient time to do so and complete the process.

Accordingly, we respectfully request that the Court issue an Order (1) extending the time for the parties to submit their joint requests to charge, voir dire, verdict form, and pretrial memorandum of law, from March 10, 2023, until March 31, 2023; (2) extending the time for the parties to submit their final pretrial order from March 17, 2023, until April 7, 2023; and accordingly, (3) rescheduling the parties' trial from April 17, 2023 until a date thereafter convenient for the Court.

This is the parties' first request for an extension of any of these deadlines in this matter.

We thank The Court for its kind consideration on this matter, and we remain available to provide any additional information.

Respectfully submitted,

*Roman Avshalumov*  
Roman Avshalumov, Esq.

CC:

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